

**Federal Defenders  
OF NEW YORK, INC.**

Southern District  
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**BY ECF**

March 31, 2022

Honorable Katherine Polk Failla  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

**MEMO ENDORSED**

**Re: United States v. John E. Cabrera  
18 Cr. 92 (KPF)**

Honorable Judge Failla,

I write to request that the Court modify the terms of John Cabrera's bail. Mr. Cabrera has been living in the community awaiting retrial since September 2021. At that time, he was released on bail with conditions including a \$100,000 personal recognizance bond co-signed by two people, pretrial supervision, and travel restrictions. I understand that Mr. Cabrera has been compliant with his bail conditions. He has been working and generally doing well.

Currently, Mr. Cabrera's travel is limited to New Jersey (where he lives) and New York. Mr. Cabrera's sister lives in Rhode Island and, with the Court's permission, he has previously visited her there. Mr. Cabrera would like to visit his sister on a more regular basis and is considering relocating to Rhode Island. As a result, I am requesting that the Court modify the terms of his bail to state that Mr. Cabrera may travel to Rhode Island with advance permission of Pretrial Services (but that he need not seek an order from the Court).

I have conferred with AUSA Dominic Gentile and New York Pretrial Services Officer Lea Harmon, and understand that neither objects to this request. Thank you for consideration of this modification.

Respectfully submitted,

/s/

Sarah Baumgartel  
Assistant Federal Defender  
Tel: (212) 417-8772

cc: Government Counsel (by ECF)

Application GRANTED. The terms of Mr. Cabrera's bail are hereby modified to permit Mr. Cabrera to travel to Rhode Island with advance permission of Pretrial Services and without seeking an additional order from the Court.

Dated: March 31, 2022  
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla". The signature is written in a cursive, flowing style.

HON. KATHERINE POLK FAILLA  
UNITED STATES DISTRICT JUDGE